

REMARKS

Claim 18 has been amended to correct a typographical error. It now refers to claim 17, rather than to itself.

The Examiner has rejected claims 1-20 under 35 U.S.C. 112, first paragraph, as containing subject matter which was not described in the specification in such a way as to enable one skilled in the art to which it pertains, or with which it is most nearly connected, to make and/or use the invention. The Examiner correctly points out that the paragraph that begins on page 5, line 10 and ends on page 5, line 18, contradicts the rest of the specification, which says the wrapper calls platform dependent software.

A correction has been made to the paragraph beginning on page 5, line 10 to correct the typographical error that makes it inconsistent with the rest of the specification. The uncorrected paragraph read, at line 18, "platform independent software." This has been changed to "platform dependent software". The change is supported by figure 1, where it can be clearly seen that the **platform dependent** method 104 calls the platform independent object 106, which is then accessible to the platform independent object 100. This is specifically illustrated in figure 1 in that the arrow from wrapper 102 points to platform dependent method 104, not to platform independent object 106. For at least this reason, Applicants respectfully request that the Examiner enter the above change. The paragraph, as amended, now fully supports claims 1-20, thus overcoming the Examiner's first 35 U.S.C. 112, first paragraph rejection.

Further, the Examiner has made second rejection of claims 1-20 under 35 U.S.C. 112, first paragraph, as containing subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time of the invention was filed, had possession of the claimed invention. Specifically, the Examiner contends, on page 2 of the office action, that the "the interface is independent, but the wrapper is not an independent wrapper; it is a dependent wrapper used to call the dependent/ native methods." Applicants respectfully traverse this rejection. The specification and drawings provide ample support for the platform independence of the wrapper. For example, figure 1 clearly shows that the only portions of native encapsulation object 100 that are platform dependent are platform dependent methods 104. If wrappers 102 were platform dependent, they would also be labeled as "platform dependent". Moreover, Applicants disclose on page 5, line 26 through page 6, line 1, that "the Java wrapper 102a...is *by definition platform independent*" (emphasis added). Thus, it

is respectfully requested that the Examiner withdraw the second 35 U.S.C. 112 rejection of claims 1-20 for at least these reasons.

The Examiner has also rejected claims 1-16 under 35 U.S.C. 102(b)-based-upon-a-public use or sale of the invention, specifically in a publication by Douglas Kramer: "The Java Platform: A White Paper." Examiner contends that the "adapter" shown in figure 2 in Kramer is equivalent to the "wrapper" of claim 1. Examiner states that "Kramer's wrapper is independent because it has independent [sic] interface." However, Kramer does not have a platform independent wrapper—what he discloses is a platform dependent adapter, which is not equivalent. ^{object to b} Applicants note that, in Kramer figure 2, the Java Base platform (shown in black) and the Applets and Applications (shown stacked above the Base platform) are platform independent. The Adapters are different on each platform—and therefore must be platform dependent. Additionally, applicants point to language immediately after Kramer figure 2 on page 17: "The porting interface has a platform independent part (shown in black), and a platform-dependent part, shown as Adapters" (emphasis added.) Thus, Kramer's adapter is clearly platform dependent and cannot be said to be in any way equivalent to the platform independent wrapper of claim 1. Applicants respectfully assert that there is no support to Examiner's contention that the Kramer's "adapters" are equivalent to the wrapper of claim 1 in light of the foregoing language and that independent claim 1 is allowable for at least this reason. <sup>P5 S124
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Claims 2-9 are either directly or indirectly dependent on independent claim 1 and are allowable for at least the same reasons as claim 1.

The Examiner has rejected independent claim 10 for the same reasons as claim 1. Applicants submit that claim 10 is allowable for at least the same reasons as claim 1.

Claims 11-17 are either directly or indirectly dependent on independent claim 10 and are allowable for at least the same reasons as claim 10.

The Examiner has rejected claims 17-20 under 25 U.S.C. 103(a) as being unpatentable over Douglas Kramer "The Java Platform: A White Paper" in view of Dana Lynn Beatty, U.S. patent no. 6,134, 616. Examiner uses the language used to reject claim 1 in the rejection of independent claim 17. Applicants believe that claim 17 is allowable for at least the same reasons given for claim 1.

Claims 18-20 are directly or indirectly dependent on claim 17 and are allowable for at least the same reasons as claim 17.

CONCLUSION

In view of the foregoing, it is respectfully submitted that all pending claims are allowable. Should the Examiner believe that a further telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,
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